

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: RAILWAY INDUSTRY)	Master Docket Misc. No. 18-798
EMPLOYEE NO-POACH ANTITRUST)	
LITIGATION)	MDL No. 2850
)	
This Document Relates to:)	
ALL ACTIONS)	

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF PROPOSED CLASS SETTLEMENTS AND TO DIRECT NOTICE
TO THE PROPOSED SETTLEMENT CLASS**

Plaintiffs hereby respectfully move the Court for an Order to, among other things: (1) preliminarily approve the terms of the Settlements dated October 16, 2019 with the Knorr Defendants and February 24, 2020 with the Wabtec Defendants as fair, reasonable, and adequate; (2) preliminarily approve the plan of allocation proposed by Plaintiffs; (3) appoint the Notice Administrator and Escrow Agent proposed by Plaintiffs; (4) approve the form and content of the Settlement Notices and the proposed dissemination of Notice; (5) conditionally certify the Settlement Class pursuant to Rules 23(a), (b)(3) and (e) of the Federal Rules of Civil Procedure; and, (6) schedule a date for Final Approval Hearing and set related deadlines.

Defendants do not oppose this Motion.

In further support of this Motion, Plaintiffs submit the accompanying memorandum of law; proposed Settlement Agreements; proposed Preliminary Approval Order; Declaration of Dean M. Harvey; and the Declaration of the Honorable Thomas I. Vanaskie.

Plaintiffs respectfully request that their Motion be granted.

Dated: February 24, 2020

Respectfully submitted,

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